

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

INTERNATIONAL UNION, UNITED
AUTOMOBILE, AEROSPACE, AND
AGRICULTURAL IMPLEMENT WORKERS
OF AMERICA,

Case No. 20-13293
Hon. David M. Lawson

Defendant.

/

DECLARATION OF MARGARET MOCK

Pursuant to 28 U.S.C. §1746, I declare as follows:

1. My name is Margaret Mock. I reside in Oakland County, Michigan. The facts set forth below are based on my personal knowledge, and if called upon to testify, I would competently do so under oath.

2. I am the duly-elected International Secretary-Treasurer of the Defendant International Union, United Automobile, Aerospace and Agricultural Implement Workers of America (hereafter "UAW" or "International UAW"). I am also an employee of Stellantis and a member of UAW Local 140, which represents Stellantis employees in Warren, Michigan. As International Secretary-Treasurer, I am a member of

International UAW's governing body between convention, the International Executive Board (the "IEB").

3. On December 12, 2022, I was sworn in as the International Secretary-Treasurer of International UAW, following a rank-and-file election among the UAW's membership. In that election, I received the highest winning vote percentage in any of the contested races for International UAW office. In my platform for election I pledged to "[f]ully cooperate with the Monitor in all investigations." See Exhibit 1 hereto, which is a true copy of my pre-election statement to UAW members as published by the UAW in the Summer 2022 issue of its magazine "Solidarity."

4. On February 20 and 23, 2024, the UAW's IEB and International UAW President Shawn Fain took various actions against me, accusing me without notice of misconduct. I have challenged and continue to challenge those allegations. Thereafter, on February 29, 2024, Neal Barofsky - the Monitor appointed pursuant to the Consent Decree in this case - commenced an investigation of the allegations made against me and my countering claim that the February 20 and 23 actions were retaliatory, improper and deficient under the UAW's Constitution and Ethical

Practices Code. The Monitor's initial announcement of his investigation (hereafter, the "February 29 Investigation") is set forth in Exhibit 2 hereto.

5. The UAW's governing document – its Constitution and Ethical Practices Code (collectively herein, the "UAW Constitution") - provides in its Article 13, Section 14 that I, as "[t]he International Secretary-Treasurer[,] shall have charge of and preserve all books, documents and effects of the International Office, except such records as properly belong to the Office of the International President."

6. Following the actions taken against me by a majority of the UAW's IEB and by International President Shawn Fain on February 20 and 23, 2024, on March 21, 2024 I filed two appeals from those respective actions, pursuant to the internal appeal procedures set forth in the UAW Constitution. The first of my March 21, 2024 appeals was to the UAW Convention Appeals Committee from the February 20, 2023 actions of the IEB. The second of my March 21, 2024 appeals was to the UAW's IEB from the February 23, 2023 and related actions of the International President Shawn Fain.

7. In addition, after receiving the required [and unanimous] support of my Local Union 140 fellow-members at a Local 140 membership

meeting, on April 14, 2024, I also filed a UAW Ethical Practices Code (“EPC”) complaint with the UAW Public Review Board. Like my two March 21, 2024 internal union appeals, this EPC complaint also challenges the February 20 and 23, 2024 actions against me by the IEB and President Fain. A true copy of my April 14, 2024 EPC complaint is submitted herewith as Exhibit 3, to illustrate my effort to challenge the February 2024 actions taken against me. (My two March 21, 2024 appeals, with exhibits, together total several hundred pages in length and raise numerous additional UAW Constitutional issues. They are not submitted herewith but can be provided to the Court if it so directs.)

8. On June 27, 2024, International Vice-President Rich Boyer filed his own internal appeal with the UAW’s International Executive Board, which Boyer supplemented on June 28, 2024. That appeal challenges a separate May 29, 2024 action of UAW President Shawn Fain removing Boyer as the Director of the UAW Stellantis Department. Boyer also filed an EPC complaint against President Fain on July 3, 2024, which UAW received on or about July 9, 2024.

9. The UAW’s appeals and Ethical Practices Code procedures referenced above are designed and intended to provide timely relief to

appellants and complainants. However, each of the above-referenced appeals and EPC complaints filed by me and by Vice-President Boyer have been and continue to be held in abeyance by the UAW President's Office until the Monitor completes the investigation it first initiated on February 29, 2024. (See Exhibits 4, 5, 6 and 7 hereto, which are true copies of letters from the UAW President's Office stating that these internal UAW appeals and EPC complaints are being held in abeyance while the Monitor investigates the issues raised therein.)

10. The withholding by the UAW's attorneys of documents requested by the Monitor – which as UAW's Secretary-Treasurer I oppose – has delayed the completion of the Monitor's investigations described in the Monitor's recent filings. That delay, in turn, has delayed the processing of the internal UAW appeals and EPC complaints filed by me and by Vice-President Boyer, as well as our receipt of such relief as may be ordered through such internal appellate avenues.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 6, 2024


Margaret Mock
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